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14	UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA	
16	SAN FRANCISCO DIVISION	
17		
18	BRIAN TOGLIA and RANDAL CORY WALKER, individually and on behalf of all	Case No. 3:11-cv-02281-EMC
19	others similarly situated,	STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
20	Plaintiffs,	MOVE, ANSWER, OR OTHERWISE RESPOND TO
21	v.	COMPLAINT ; ODRER
22	SONY COMPUTER ENTERTAINMENT AMERICA LLC, a Delaware Limited Liability	Judge: Edward M. Chen
23	Company; SONY NETWORK ENTERTAINMENT INTERNATIONAL LLC, a	
24	Delaware Limited Liability Company; and SONY CORPORATION OF AMERICA, a New York	
25	Corporation,	
26	Defendants.	
27		k
28		STIPULATION TO EXTEND TIME FOR DEFENDA

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT CASE NO. 3:11-cv-02281-EMC

1 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") (f/k/a 2 Sony Computer Entertainment America, Inc.), Sony Network Entertainment International LLC 3 ("SNEI") and Sony Corporation of America ("SCA"), as well as certain related entities 4 (collectively, the "Sony Defendants"), have been named as defendants in at least twenty-five (25) 5 putative class action lawsuits within this District, to date; 6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at 7 least nineteen (19) putative class action lawsuits pending outside this District, to date; 8 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict 9 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed 10 to date, and as to which other responses, including Sony Defendants' response, are due by June 2, 11 2011. WHEREAS, the current deadline for SCEA, SNEI and SCA to respond to the Complaint 12 13 is July 26, 2011; WHEREAS, the parties have agreed to the extension of time herein for the defendants in 14 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to 15 facilitate the scheduling of this matter in coordination with the schedule for the motion before the 16 JPML; 17 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties, 18 19 by and through their respective counsel, hereby stipulate as follows: The deadline for the defendants to respond to the Complaint in the above-captioned action 20 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict 21 22 litigation centralizing the above-captioned action with other matters, or if centralization is denied by the JPML, then 30 days from the date of such order denying centralization. 23 24 /// 25 26 27 28

1 2 3 Either party may seek ex parte relief from this stipulated Order for good cause shown, 4 including, but not limited to, Defendants' filing of a responsive pleading in a related case. 5 VAHN ALEXANDER Dated: May 31, 2011 6 FARUQI & FARUQI, LLP 7 By: /s/ Vahn Alexander /s/ [as authorized] Vahn Alexander 8 Attorneys for Plaintiffs BRIAN TOGLIA and RANDAL CORY 9 WALKER 10 HARVEY WOLKOFF Dated: May 31, 2011 11 THAD A. DAVIS ROCKY C. TSAI 12 ROPES & GRAY LLP 13 /s/ Rocky C. Tsai /s/ By: Rocky C. Tsai 14 Attorneys for Defendants 15 SONY COMPUTER ENTERTAINMENT AMERICA LLC 16 and SONY NETWORK ENTERTAINMENT INTERNATIONAL 17 LLC. 18 [PROPOSED] ORDER 19 PURSUANT TO STIPULATION, IT IS SO ORDERED. 20 21 6/3/11 By Dated: 22 IT IS <u>SO</u> ORDERED 23 24 Judge Edward M. Chen 25 26 27 28 STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT

CASE No. 3:11-cv-02281-EMC